

EXHIBIT 42

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7

8 UNITED STATES DISTRICT COURT
9 CENTRAL DISTRICT OF CALIFORNIA
10 WESTERN DIVISION

11 CORY SPENCER, an individual; DIANA
MILENA REED, an individual; and
12 COSTAL PROTECTION RANGERS,
INC., a California non-profit public
13 benefit corporation,

14 Plaintiffs,

15 vs.

16 LUNADA BAY BOYS; THE
INDIVIDUAL MEMBERS OF THE
17 LUNADA BAY BOYS, including but not
limited to SANG LEE, BRANT
18 BLAKEMAN, ALAN JOHNSTON aka
JALIAN JOHNSTON, MICHAEL RAE
19 PAPAYANS, ANGELO FERRARA,
FRANK FERRARA, CHARLIE
20 FERRARA and N.F.; CITY OF PALOS
VERDES ESTATES; CHIEF OF
21 POLICE JEFF KEPLEY, in his
representative capacity; and DOES 1-10,
22

23 Defendants.

Case No. 2:16-CV-02129-SJO-RAO
Judge: Hon. S. James Otero

**RESPONSES BY DEFENDANT
BRANT BLAKEMAN TO
PLAINTIFF CORY SPENCER'S
FIRST SET OF
INTERROGATORIES**

Complaint Filed: March 29, 2016
Trial Date: November 7, 2017

24 PROPOUNDED BY: Plaintiff, Cory Spencer

25 RESPONDED BY: Defendant, Brant Blakeman

26 SET NO.: One (1)
27
28

1 Pursuant to Rule 33 of the Federal Rules of Civil Procedure, Plaintiff CORY
2 SPENCER ("Responding Party") hereby submits these objections and responses to
3 Interrogatories, Set One, by Defendant BRANT BLAKEMAN ("Propounding
4 Party").

5 **PRELIMINARY STATEMENT**

6 Nothing in this response should be construed as an admission by Responding
7 Party with respect to the admissibility or relevance of any fact, or of the truth or
8 accuracy of any characterization or statement of any kind contained in Propounding
9 Party's Interrogatories. Responding Party has not completed its investigation of the
10 facts relating to this case, its discovery or its preparation for trial. All responses and
11 objections contained herein are based only upon information that is presently
12 available to and specifically known by Responding Party. It is anticipated that
13 further discovery, independent investigation, legal research and analysis will supply
14 additional facts and add meaning to known facts, as well as establish entirely new
15 factual conclusions and legal contentions, all of which may lead to substantial
16 additions to, changes in and variations from the responses set forth herein. The
17 following objections and responses are made without prejudice to Responding
18 Party's right to produce at trial, or otherwise, evidence regarding any subsequently
19 discovered information. Responding Party accordingly reserves the right to modify
20 and amend any and all responses herein as research is completed and contentions
21 are made.

22 **INTERROGATORIES AND REPONSES**

23 **INTERROGATORY NO. 1:**

24 Identify the telephone number for each cell phone YOU have owned or for
25 which YOU have been the primary user from January 1, 2012 to present.

26 **SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 1:**

27 Objection: This interrogatory calls for information that violates defendant's
28 right to privacy guaranteed by Article 1, section 1 of the California Constitution,

1 and is overly broad, and calls for information that is neither relevant nor reasonably
2 calculated to lead to the discovery of admissible evidence. Without waiving these
3 objections, Defendant responds as follows: See Exhibit A, attached hereto.
4

5 DATED: May 19, 2017

BUCHALTER
A Professional Corporation

By: 

ROBERT S. COOPER
AUDREY S. OLSON
Attorneys for Defendant
Brant Blakeman

EXHIBIT A

CONFIDENTIAL- ATTORNEY'S EYES ONLY

Blakeman cell phone number: [REDACTED]-7934

VERIFICATION

SPENCER V. CITY OF PALOS VERDES ESTATES, et al.

I, Brant Blakeman, am a defendant in the above- referenced lawsuit, and as such I am authorized to make this verification in the above-referenced action. I have read the Supplemental Responses to Plaintiff's Special Interrogatories, (Set One), and I am familiar with the contents thereof; that the same is true of my own knowledge, except as to the matters which are therein stated on my information or belief, and as to those matters I believe it to be true.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed this 23 day of May 2017, at Palos Verdes Estates, California



Brant Blakeman

PROOF OF SERVICE

Spencer, et al. v. Lunada Bay Boys, et al.
USDC, Central District of California, Case No. 2:16-cv-02129-SJO (RAOx)

I am employed in the County of Los Angeles , State of California. I am over the age of 18 and not a party to the within action. My business address is at BUCHALTER NEMER, A Professional Corporation, 1000 Wilshire Boulevard, Suite 1500, Los Angeles, CA 90017-2457.

On the date set forth below, I served the foregoing document described as:

RESPONSES BY DEFENDANT BRANT BLAKEMAN TO PLAINTIFF CORY SPENCER'S FIRST SET OF INTERROGATORIES

on all other parties and/or their attorney(s) of record to this action by ☐ faxing and/or ☒ placing a true copy thereof in a sealed envelope as follows:

SEE ATTACHED SERVICE LIST

☒ **BY MAIL** I am readily familiar with the business' practice for collection and processing of correspondence for mailing with the United States Postal Service. The address(es) shown above is(are) the same as shown on the envelope. The envelope was placed for deposit in the United States Postal Service at Buchalter Nemer in Los Angeles, California on May 26, 2017. The envelope was sealed and placed for collection and mailing with first-class prepaid postage on this date following ordinary business practices.

☒ **BY MAIL** I am readily familiar with the business' practice for collection and processing of correspondence for mailing with the United States Postal Service. The address(es) shown above is(are) the same as shown on the envelope. The envelope was placed for deposit in the United States Postal Service at Buchalter Nemer in Los Angeles, California on May 26, 2017. The envelope was sealed and placed for collection and mailing with first-class prepaid postage on this date following ordinary business practices.

☒ I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct to the best of my knowledge.

Executed on May 26, 2017, at Los Angeles, California.

Connie Lazo

(Signature)

SERVICE LIST

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USDC, Central District of California, Case No. 2:16-cv-02129-SJO (RAOx)

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USDC, Central District of California, Case No. 2:16-cv-02129-SJO (RAOx)

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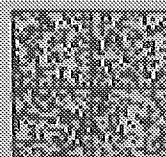
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